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*Lead Counsel for the Indirect Purchaser
Plaintiffs for the 22 States*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 4:07-cv-05944-JST
Case No. 4:13-cv-03234-JST

MDL No. 1917

This Document Relates to:

INDIRECT PURCHASER ACTIONS
FOR THE 22 STATES

**DECLARATION OF LAUREN C. CAPURRO
IN SUPPORT OF INDIRECT PURCHASER
PLAINTIFFS' OPPOSITION TO: (1)
REQUEST FOR EXPEDITED RELIEF; (2)
MOTION TO EXTEND TIME TO APPEAL
JUDGMENT; AND (3) MOTION TO
INTERVENE FOR PURPOSE OF APPEAL;
MOTION TO STRIKE**

Hearing Date: Hearing Requested at the
Discretion of the Court
Courtroom: 6, 2nd Floor (Oakland)
Judge: Honorable Jon S. Tigar

1 I, Lauren C. Capurro, declare:

2 1. I am an attorney duly licensed by the State of California and am admitted to
3 practice before this Court. I am a partner with the law firm Trump, Alioto, Trump & Prescott,
4 LLP and my firm serves as the Court-appointed Lead Counsel for the Indirect Purchaser
5 Plaintiffs (“IPPs”) for the 22 Indirect Purchaser State Classes in the above-captioned action. I
6 submit this Declaration in support of the IPPs’ Opposition to Request for Expedited Relief,
7 Motion to Extend Deadline to Appeal and Motion to Intervene, filed herewith. The matters set
8 forth herein are within my personal knowledge except as to those statements that are expressly
9 made on information and belief. If called upon and sworn as a witness I could competently testify
10 regarding the matters set forth in this declaration.

11 2. Attached hereto as Exhibit 1 is a true and correct copy of the email I sent to
12 Robert Bonsignore on August 29, 2020, requesting that he withdraw his Motion. Mr. Bonsignore
13 did not respond.

14
15 I declare under penalty of perjury that the foregoing is true and correct. Executed this 3rd
16 day of September, 2020 at San Francisco, California.

17
18 /s/ Lauren C. Capurro

19 Lauren C. Capurro

20 ***Counsel for the Indirect Purchaser Plaintiffs for***
21 ***the 22 States***

EXHIBIT 1

From: [Lauren Capurro \(Russell\)](#)
To: rbonsignore@class-actions.us
Cc: malieto@tntp.com
Subject: CRT/Request to withdraw pending motion, ECF No. 5815
Date: Saturday, August 29, 2020 9:21:46 PM
Importance: High

We request that you immediately withdraw your pending Motion to Expedite, Motion to Extend Time to Appeal and to Intervene for Purposes of Appeal, ECF No. 5815.

Your pending motion as been mooted by the Notice of Appeal of the Final Judgment that you filed yesterday. By your own admission, this has divested the Court of jurisdiction over your motion.

Moreover, there have now been a total of ten motions relating to objectors' attempts to intervene, all of which have been denied in no uncertain terms.

You have already unnecessarily multiplied the proceedings by not bringing your present motion at the same time as your Joinder in the earlier motion to intervene by the ORS/NRS. We urge you not to compound this problem by forcing us to respond to your pending (now moot) motion.

We have already devoted time to your pending motion and are continuing to do so. Please advise us immediately whether you will withdraw your pending motion so that we don't continue to devote time to it.

Thank you.

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